



27 May 2003

Bill Pennington  
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California Energy Commission  
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sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Section 149 (b) 2.B

Dear Mr. Pennington:

**Comment**

This subsection should be rewritten to clarify the intent of the CEC.

**Rationale**

As written, the standard to which the altered components are being compared to is unclear. Read literally, it would seem to create a continuous spiral of over-improvement, where as a standard only those components of the alteration which do not individually meet the requirements of Section 149 (b) are assumed to meet minimum requirements, while the components which are designed to be "supercompliant" are left in place.

I believe that the intent of this subsection would be clearly stated by changing the new wording at the end of this paragraph to read:

except that all altered components are assumed to comply with Section 149(b).

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer  
Director, Legal & Technical Affairs  
Henry Company

